

PIERCE BAINBRIDGE

John M. Pierce
Managing Partner
355 S. Grand Avenue, 44th Floor
Los Angeles, CA 90071
jpierce@piercebainbridge.com
(213) 262-9333

VIA CM/ECF

October 13, 2020

Honorable Lorna G. Schofield, U.S.D.J.
United States District Judge
Southern District of New York
40 Foley Street
New York, NY 10007

Re: *Solid 21, Inc. v. Richemont North America, Inc., et al*; No. 19-cv-1262 (LGS)
Letter Motion to Withdraw as Attorney of Record

Dear Judge Schofield:

I previously appeared as counsel for Plaintiff Solid 21, Inc. in the above-captioned action. Pursuant to Local Rule 1.4, I respectfully request that I be allowed to withdraw as counsel of record for Plaintiff in this action and be terminated from the docket effective immediately.

The primary Pierce Bainbridge attorney that it hired to handle this case departed the firm. Pierce Decl. ¶ 3. Pierce Bainbridge is no longer able to competently represent Solid 21 in this action without unreasonable financial burden. *Id.* ¶ 4. Additionally, a break down in the attorney-client relationship has impaired Pierce Bainbridge's ability to continue the representation. *Id.* ¶ 5. Collectively, these circumstances require Pierce Bainbridge to withdraw. Curtis, Brinckerhoff and Barrett was retained for the limited purpose of serving as local counsel to Pierce Bainbridge. *Id.* ¶ 7. Plaintiff is aware of Pierce Bainbridge's inability to continue representing him and has elected to search for new counsel. *Id.* ¶ 8.

The following significant pleadings have been filed to date. Plaintiff filed the operative Third Amended Complaint on September 27, 2019. (Dkt. No. 67) Defendants moved to dismiss the TAC on October 18, 2019. (Dkt. No. 68) The Court granted in part and denied in part Defendants Motion to Dismiss on June 8, 2020. (Dkt. No. 91) Defendants filed their Answer and Counterclaims to the TAC on July 13, 2020. (Dkt. No. 98) Plaintiff filed its Answer to Counterclaims on August 3, 2020. (Dkt. No. 102). No motions are pending at this time.

The parties are currently discussing a settlement that may result in dismissal of this action. If a resolution is reached, the parties will notify the Court and file a stipulation of dismissal.

In light of the search for new counsel, Plaintiff requests that Plaintiff be allowed sixty (60) days to find new counsel from the date of the Order allowing withdrawal of counsel, and that all deadlines in this case be stayed until the requested sixty (60) days has elapsed.

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Letter to Judge Lorna G. Schofield, U.S.D.J.

October 12, 2020

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A copy of this letter has been served on all parties via CM/ECF, and I have also served a copy of this letter to the client (Plaintiff Solid 21, Inc.) via email.

Respectfully submitted,

/s / John M. Pierce

John M. Pierce

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Counsel for Plaintiff

cc: Counsel of Record via CM/ECF
Christopher Aire, CEO of Plaintiff Solid 21, Inc. via email